

RE: Docket ID Number OPP-2002-0049

As a pest control professional I use a variety of tools to control rodent populations. A number of factors are used to determine the best tool for any given situation but many times the best tool for control of rodent population is the use of rodenticide bait. Upon learning of the "Comparative Risks of Nine Rodenticides to Birds and Non-target Mammals" document I expected to see a discussion of both the risks and BENEFITS of public health pesticides such as rodenticides. However, the Federal Register notice announcing the availability of this document:

- contains no discussion of the public health benefits of rodenticide products;
- does not state the purpose of this document, or how it will be used by EPA;
- does not explain the process for public health benefits of rodenticides to be identified or considered.

We ask that EPA to insure that a complete and proper review of these rodenticides is conducted that address the above items. These are vital products necessary to preserve public health, as we know it, in the United States. Rodenticides provide significant public health benefits. Rats and mice, two of the many destructive disease carrying rodents controlled by these products, spread more than 35 diseases worldwide, some of which can be fatal, e.g., Hantavirus, Rat Bite Fever, and Leptospirosis. The diseases are spread in many ways: directly through bite wounds; through contamination of human food, water, or habitation by rodent urine or feces; or by way of ticks, mites, fleas, and other biting insects that transmit the infection to humans after feeding on infected rodents. The Rodenticide Stakeholder Workgroup (RSW), a stakeholder group that EPA convened in 1999 to advise EPA on certain rodenticide issues, noted that the "societal value of rodent control is high" and the "benefits of keeping rodent infestations in check through the proper use of rodenticides or other alternative measures are many fold."

Given the public health concerns presented by large-scale rodent infestations, it is even more imperative that the important role rodenticides play be considered and acknowledged in the context of the Rodenticide Comparative Preliminary Assessment

Sincerely yours,

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